

Carey M. King  
AKA John Doe /  
Jane Doe  
EWCC PO. BOX 315  
Taft, OK 74463  
OR

10755 E. 29th Pl. - Home  
Tulsa, OK. 74129

**FILED**

DEC 14 2023

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT WESTERN DIST. OKLA.  
BY KB, DEPUTY

CIV-23-1141-PRW

United States District Court  
For The Western District of Oklahoma

Carey M. King, Plaintiff  
AKA John Doe / Jane Doe  
v.

The State of Oklahoma-Kein Sitt  
Judge Palumbo, Attorney General,  
David Prater, Judge Troung, Judge Mai,  
Judge Elliott (con't on Next Page)

Case No.

Civil Rights Complaint  
Pursuant to 42 U.S.C.  
1983

A. Jurisdiction

1) Carey M. King (Plaintiff), is a citizen of Oklahoma, who presently resides at Dr. Eddie Warrior Correctional Center.

2) All Defendants listed in this complaint except the inmates are citizens of the State of Oklahoma that I know of, they are employed as state officials, elected officials, mental health professionals, government

United States District Court  
For The Western District of Oklahoma

Civils Rights Complaints  
Pursuant TO 42 U.S.C 1983

Carey M. King, Plaintiff

AKA Jane / John Doe

Charles King AKA Jane / John Doe

Chevon King AKA Jane / John Doe

Tearra King AKA Jane / John Doe

Paries Cannady AKA Jane / John Doe

Deoyonte Moore AKA Jane / John Doe

Deoyonte Moore Jr (minor)

Deoyon 'Janae Moore AKA Jane / John Doe

Latrice Vaughn AKA Jane / John Doe

Amy Bluse AKA Jane / John Doe

Shayna Sims AKA Jane / John Doe

Le'Andrea Jackson-Hubbs AKA Jane / John Doe

Jessica Roberts AKA Jane / John Doe

V,

The State of Oklahoma - Kevin Stitt, Defendant(s)

The United States President - Joe Biden

The United States Vice President - Kamala Harris

The Lieutenant Governor - Oklahoma

Secretary of the State - Oklahoma

Attorney General - Oklahoma

President of the Senate

Justin Farris - Dept of Corrections

Mr. Casnar - EWCC CIOA



Continued Defendant(s)

The State of Oklahoma - Dept of Corrections (CCA)

Mabel Bassett Correctional Center / CCA

Dr. Eddie Warrior Correctional Center / CCA

Tamicka White - Warden - MBCC / Acting

Christie Sweat - Warden - EWCC / Acting

Steven ~~Star~~ Harpe - Dept of Corrections Director

Scott Crow - Dept of Corrections

Mr. Braggs - Dept of Corrections

Ms. Natalie Cooper - Dept of Corrections

Mr. Carl Bear - Dept of Corrections

Travis Gray - Dept of Corrections

Mrs. Braggs - Dept of Corrections

Chief Medical Officer - Dept of Corrections

Sentence Administration - Dept of Corrections

Quality Assurance - Dept of Corrections

K9 Program - Dept of Corrections

Trustfund - Dept of Corrections

General Counsel - Dept of Corrections

Agent Hale - Dept of Corrections OIG

Agent Cox - Dept of Corrections OIG

Securus Technologies

Ms. Posey - EWCC

Auditing and Compliance - Dept. of Corrections

Lawton Correctional Facility [GEO Group, Inc]

Staffing Analysis - Dept. of Corrections

Training - Dept of Corrections

Offender Records - Dept. of corrections

Legislative Liaison - Dept. of Corrections

Professional Development and Succession Planning -

Dept. of Corrections

Continued Defendant(s)

District Attorney Tim Harris - Tulsa

Judge Tom Gillert - Tulsa

Judge Priddy - Tulsa

Judge LaFortune - Tulsa

Tulsa County Police Dept - Tulsa

Tulsa County Jail (David L. Moss) - Tulsa

Tulsa County Municipal Court - Tulsa

District Attorney Steven Kunzweiler - Tulsa

Damon Sacra - Tulsa

Scott Goode - Tulsa

Gina Niensteil - Tulsa

Tulsa County Court Clerk Sally Howe Smith - Tulsa

Rogers County Police Dept - Claremore

Rogers County Jail - Claremore

Oklmulgee County Jail - Okmulgee

Tulsa County Evidence/Forensic Dept - Tulsa

OSBI - Oklahoma

Bureau of Justice

Federal Bureau Investigation - Washington

Dr. Hamed - MBCC

Dr. Collier - MBCC

John Doe - MBARC

Ms. Green - MBCC

Dr. Crowell - MBCC

PharmaCorr - OKC

Ms. Boyles - CHSA

Ms. Repp - DON - MBCC

Ms. Bricker - MBCC

Jane Doe - Nursing Staff

Dr. Pittman - Mental Health



Continued Defendant(s)

MS. Calloway - Mental Health - MBCC

Dr. Raju - MBCC / EWCC - Mental Health

Dr. Tromka - EWCC - Mental Health

MS. Oliver - EWCC - Medical

MS. May - EWCC Medical

Dr. Getty's - EWCC Medical

MS. Buerker - EWCC Medical

MS. Anderson - EWCC Medical

MS. Moore - EWCC Medical

MS. Boling - EWCC Medical

MS. Oliver - EWCC Medical NP

Mr. Breslin - EWCC Warden (2022)

MS. Roper - EWCC DW (2022)

MS. V. Witherspoon

MS. Clark - EWCC

MS. Carter - EWCC

Mr. Bleu - EWCC Dental

EWCC Kitchen Supervisor - (Ms. Moss)

MBCC Kitchen Supervisor

Sprint

Tulsa Detective Division

MS. Holtz - MBCC

Mr. Elder - MBCC

Mr. OJO - MBCC

DW Brewer - MBCC

Mr. Bateman - MBCC

Mr. Akinbode - MBCC

Lt. Sasser - EWCC

Mr. Batson - EWCC

Mr. Visor - EWCC

MS. Cartwright - EWCC Lt.  
MS. Cartwright - EWCC Sgt.  
Mr. Mc Carver - EWCC  
Mr. Haynes - MBCC  
Mr. Hull - MBCC  
Mr. Leirman - MBCC  
Mr. Taylor - EWCC  
MS. Azghar - EWCC  
Nalani Ching - Muskogee County  
Andrea Brown - Tulsa County  
Kevin Gray - Tulsa County  
Tulsa Public Defenders Office - Tulsa  
MS. Rodriguez - EWCC  
MS. Graham - MBCC  
Mr. Onajobi - MBCC  
MS. Holland - MBCC  
Mr. Adeosun - MBCC  
The Appellate Courts - OK  
MS. Ford - MBCC  
Dr. Ritter - EWCC  
MS. Dickerson / Simmons - EWCC  
MS. Seely - EWCC  
MS. West - MBCC  
MS. Lorentz - MBCC  
Mr. Erskine - MBCC  
Mr. Burchette - MBCC  
MS. Cummings - MBCC  
MS. Woods - MBCC  
MS. Baker  
Mr. Adigan - MBCC

## Defendants

MS. Lang - MBCC

MS. Willis - MBCC

Mr. Burgess - EWCC

Mr. Stogner - EWCC

Mr. Moore - EWCC

MS. Henderson - EWCC

M. J. Denham - Tulsa County Attorney

Mr. Wright Lester

MS. Paxson - MBCC

MS. Baltis - EWCC (2021-2022)

Mr. Clark - EWCC

Janie Davis - MBCC Inmate

Ariana Jordan - MBCC Inmate

Tennecia Pennon - MBCC Inmate

Benita Wells - MBCC Inmate

Telesha Jones - MBCC Inmate

Kimberly Marsh - MBCC Inmate

Brianna Lee - MBCC Inmate

Tonyia Hill - MBCC Inmate

Shantoria Jordan - MBCC Inmate

Misty Ruskovic - EWCC Inmate

Brianna Indiveri - MBCC Inmate

Madison Payne - MBCC/EWCC 2023

Ashley Graham - MBCC Inmate

Tashika Washington - MBCC Inmate

Selena Geraurd - MBCC Inmate

Treon Bennett - MBCC Inmate

Tiffany Wesley - MBCC Inmate

Inola Cannon - MBCC Inmate

Ashley Clemmons - MBCC Inmate



Continued Defendant(s)

Charlisa - MBCC Inmate

Joy Mora - MBCC Inmate

Teresa Cope - MBCC Inmate

Ms. Wapha - EWCC

Ms. Cote - MBCC

Mr. Wilson - EWCC

Mr. Seight - MBCC

Meosha - MBCC

Tiesha Ealey - MBCC

Leona Archer - EWCC

Autumn Price - EWCC

Raven Guillian - MBCC (2023)

Mr. Owije - MBCC

Ms. Hughes - MBCC

Ms. Medlen - MBCC 2023

Charles Harvey Muskogee Health Dept.

J. Terrence Dunn PhD



officials, medical personnel, dental, municipal officials, police department, phone companies, and hold some position of authority. They were all acting under the color of state law.

The inmates were all housed in the Department of Corrections in the State of Oklahoma: Mabel Bassett and Dr. Eddie Warrior Correctional Center.

### B. Nature OF The Case

I began my 12 year sentence in Tulsa County CF:2012-2521 Oct 1, 2013. I was arrested 6/2012 by two male officers who reached in my pocket grabbed my phone without a ~~cellphone~~ search warrant. According to Tulsa County Court Clerk and Police Department there was no search warrant for CF: 2012-2521 or for Jane/John Doe. I've been incarcerated for 10 years 2 months. I do have two co-defendants. The state of Oklahoma violated several of my constitutional rights beginning with the 1<sup>st</sup> Amendment, 4<sup>th</sup> Amendment, 5<sup>th</sup> Amendment, 6<sup>th</sup> Amendment, 7<sup>th</sup> Amendment, and the 8<sup>th</sup> Amendment. Ofc. Ryder grabbed me by the neck while the male detective who was interrogating me in their white vehicle came around to arrest me after my phone vibrated, he reached in my pocket and took my phone. I was placed under arrest for obstruction because I chose to get out the vehicle. I never was read my miranda rights. The obstruction charge was dismissed with costs. In June 2012 the same officers pulled the vehicle over my husband over with guns drawn on my 15 year old daughter believing she was

me. At which point they told her to call me. When I spoke to them they asked me if we could meet up so that they could book me in on conspiracy to commit robbery x2, \$40,000 bond. I turned myself in at which time Scott Goode was retained by my father to do a bond reduction which was never filed until after I posted bail. Six months later my charges were amended 1st Degree Robbery was added and Robbery with a Firearm. I remained on bond. My attorney told me he had my discovery it was 900 something pages long that we needed to talk to Andrea Brown to try and make a deal. No deal was ever made. Scott Goode withdrew took a job with the Tulsa Public Defender's office at which time he told me it would be conflict of interest and referred me to his friend Damon Sacra and sent him some of the money that was paid to him. Sacra entered his appearance on both of my cases. Oct. 1, 2013 I turned myself in for sentencing. Prior to Oct. 1, 2013, Sacra stated he could get me in Female in Diversion Program because the coordinator was a good friend of his but I would have to take a blind plea. While completing my Plea of Summary of Facts I asked if I could go to trial he said the only way he would go tell Judge Gillert that is if I paid him \$10,000 because he wasn't going to do the back and forth. I told him I can get a public defender. He put on my paperwork about my depression disorder but stated



it didn't matter about my medication the judge didn't care and marked no. In October Ms. Deinsteil came to see me she completed my PSI with many errors. Nov. 18, 2013 the judge hadn't even seen my PSI. Saura and Judge Gillert went into the chambers, Saura came back, he said the Judge is offering you 20 years with a one year review he said now keep in mind on your one year review he don't have to modify your sentence or 12 years without a review. I asked can I get a split sentence he said no you don't qualify. After sentencing I appealed the decision. Prior to that during Sentencing Saura called me an ungrateful cunt. M.J. Denham was appointed for my appeal I was threatened with a life sentence from Judge Gillert so I stood up I asked him if I could keep the 12 years I received. I arrived at MBARC 01/2014 at which time my assessment paperwork my days were 4310. I remained at Mabel Bassett until 2016 until I was transferred to EWCC. While housed at Mabel Bassett I was harassed, I went nights without a mat, falsely accused of PREA, there was a Chief who was a convicted felon from the State of California, accused of having a knife thrown over the fence, etc. In 2020 I became a victim to rape, three assaults, and almost lost my life. There were death threats made at Mabel Bassett that followed me to EWCC. I had numerous



Seizures, and went into a coma after CPR was performed. I layed half naked in a cell because I urinated and defacated on myself. I went without Food and water. Medical or staff would help me. I am requesting all video surveillance for both facilities because I was poisoned with arsenic / fentanyl.

### C. Cause of Action

1) I allege that the following of my constitutional rights, privileges, or immunities have been violated and that the following facts form the basis for my allegations:

A)(1) Count 1: 1<sup>st</sup> Amendment right, 4<sup>th</sup> Amendment right, 5<sup>th</sup> Amendment, 6<sup>th</sup> Amendment, 7<sup>th</sup> Amendment, 8<sup>th</sup> Amendment

(2) Supporting Facts:

Declaration Form, Phone Records, Video Surveillance. These defendants had knowledge about the death threats, lack of medical treatment, cruel and unusual punishment, or were part of the actual plan of executing the murder/plot of killing me and my family.

### D. Previous Lawsuits And Administrative Relief

1) I have no other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to the conditions of your imprisonment.

2) I have sought informal and formal relief from appropriate administrative officials regarding

the acts complained of in Part C,

### E. Request For Relief

1) I believe that I am entitled to the following relief: (I= Carey M. King)

There were at least six amendment rights of the U.S. Constitution violated. I was a victim of rape and anal sodomy. I was poisoned with arsenic / fentanyl. I had numerous seizures went into a coma without medical treatment. I went days without food/water. I urinated and defecated on myself. I layed half naked for days. All this because an inmate told staff I was hallucinating and delusional.

This inmate is the same inmate is the one who threatened to kill me and my family. DOC Policy and Procedures were not followed. Compensatory Damages: ~~28~~<sup>two</sup> million dollars against each defendant individually, in their official capacity, and severally

Nominal damages: 1 million dollars against each defendant individually, in their official capacity, and severally

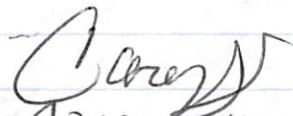
Punitive damages: 2 million dollars against each defendant individually, in their official capacity, and severally



Carey M. King also seek criminal charges on all issues that are considered against the law in criminal court.

Carey M. King seek those who hold license in the medical or judicial field relinquish their license. All others terminated immediately.

Carey M. King seek recovery of costs in this suit, and any additional relief this court deem just, proper, and equitable.

  
Carey M. King  
Petitioner

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares (or certifies, verifies, or states) under penalty of perjury that he is the Plaintiff in the above action, that he has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. § 1746. 18 U.S.C. § 1621.

Executed at EWCC P.O. Box 315 Taft, OK 744163 on Dec 6, 2023  
(Location) (Date)

A handwritten signature in black ink, consisting of a stylized 'L' and 'K' joined together, with a horizontal line extending to the right.

(Signature)